

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

ROSLYN LA LIBERTE,

Plaintiff,

- against -

JOY REID,

Defendant.

Case No.: 1:18-cv-05398-DLI-VMS

**REPLY DECLARATION IN  
FURTHER SUPPORT OF  
DEFENDANT’S MOTION TO  
REVOKE THE *PRO HAC VICE*  
ADMISSION OF L. LIN WOOD**

JOHN H. REICHMAN declares under penalty of perjury and pursuant to 28 U.S.C. § 1746, as follows:

1. I am a member of Johnreichmanlaw LLC, attorney for Defendant Joy Reid, along with Gibson, Dunn & Crutcher LLP. I submit this reply declaration in further support of Ms. Reid’s motion to revoke the *pro hac vice* admission of L. Lin Wood, one of Plaintiff’s attorneys, and in response to Plaintiff’s opposition papers.

2. Ms. Reid’s initial motion papers referenced a Delaware action, *Page v. Oath, Inc.*, No. S20C-07-030, in which the Superior Court in Delaware revoked Mr. Wood’s *pro hac vice* status. Dkt. 64-27. Mr. Wood states in his answering affidavit that the order revoking his *pro hac vice status* has been appealed. Dkt. 66-3 ¶ 28. But the docket for the *Page* case does not show that an appeal has been filed.<sup>1</sup>

3. Subsequent to the filing of Ms. Reid’s motion, she learned that the Georgia State Bar is proceeding with an inquiry pursuant to Bar Rule 4-104 against Mr. Wood. The rule says “mental illness, cognitive impairment, alcohol abuse, or substance abuse, to the extent of impairing

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<sup>1</sup> Attached hereto as **Exhibit A** is a true and correct copy of the docket in *Page v. Oath, Inc.*, No. S20C-07-030, last accessed on February 11, 2021.


competency as a lawyer” are grounds for revoking an attorney’s license to practice law.<sup>2</sup> The rule further provides that the State Disciplinary Board may require an attorney to submit to a mental health examination, and Mr. Wood has indeed been asked to undergo such an examination.<sup>3</sup>

4. Mr. Wood has stated that the State Bar told him they “would demand a mental health exam from me if I wanted to keep my law license,” and that he would refuse to submit to such an examination.<sup>4</sup> Under Rule 4-104, this refusal may be grounds for further proceedings, including an emergency suspension of Mr. Wood’s license.

5. Mr. Wood has not advised this Court of the investigation by the Georgia State Bar.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 12, 2021



JOHN H. REICHMAN

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<sup>2</sup> Attached hereto as **Exhibit B** is a true and correct copy of Georgia State Bar Rule 4-104.

<sup>3</sup> Attached hereto as **Exhibit C** is a true and correct copy of an article from the ABA Journal, published on February 1, 2021.

<sup>4</sup> Attached hereto as **Exhibit D** is a true and correct copy of an article from *Law and Crime*, published on January 29, 2021.